

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GEORGE IVERSON, Individually,	.	
	.	
Plaintiff,	.	
	.	CIVIL ACTION NO.
v.	.	1:04-CV-11835-JLT
	.	
MANFELD HOTEL ENTERPRISES,	.	
LIMITED PARTNERSHIP, a	.	
Massachusetts Limited Partnership	.	
	.	
Defendant.	.	

JOINT MOTION TO CONTINUE STATUS CONFERENCE

Pursuant to Federal Rules of Civil Procedure 7(b), Defendant, COPLEY PLAZA 2001 LLC, and Plaintiff, GEORGE IVERSON move this Court to continue the July 21, 2005 status conference for additional thirty (30) days based upon the following facts:

1. On June 15, 2005, the court granted a motion to continue the stay of discovery in the above referenced matter. The Court's subsequent order scheduled a status conference for July 21, 2005.
2. During the period from to present, the parties have engaged and continue to engage in efforts to settle the instant action through the submissions of proposals for settlement.
3. On July 18, 2005, the parties communicated via telephone and agreed that their resources would be better devoted to continued settlement discussions. The parties agreed to request the Court to continue the July 21, 2005 status conference for an additional thirty (30) days.

4. The parties believe that continued settlement discussions will benefit both parties in their efforts to resolve the above referenced this matter without expending valuable resources for expensive discovery and continued protracted litigation.

WHEREFORE, the Defendant and Plaintiff respectfully request that the Court continue the July 21, 2005 status conference for an additional thirty (30) days.

Respectfully submitted,

MANFELD HOTEL ENTERPRISES,

By its Attorneys,

Date: July 18, 2005

s/ Laurence Donoghue
Laurence Donoghue, Esq.
Mass BBO# 130140
Morgan, Brown & Joy, LLP
200 State Street
Boston, MA 02109
(617) 523-6666

and

GEORGE IVERSON

By his Attorneys,

Date: July 18, 2005

s/ John P. Fuller
O. Oliver Wragg, Esq
Mass BBO# 643152
John P. Fuller, Esq.
Admitted Pro Hac Vice
Fuller, Fuller & Associates, PA
12000 Biscayne Blvd., Suite 609
North Miami 33181
(305) 891-5199